



November __, 2003

To: All Class Members in
Dalesandro, et al. v. The International Paper Company
Case No. C-1-01-109
U.S. District Court, Southern District of Ohio

This letter is being sent to you to inform you of the status of a dispute which arose from responses to the Court Ordered Notice dated September 24, 2003.

Your entitlement to payment for unused vacation that you may have banked and earned as of February 9, 2001 with International Paper is in dispute. International Paper's position is that you are not entitled to vacation pay in this lawsuit, and we, as your class counsel, disagree and contend that you are entitled to vacation pay as part of the benefits under Policy #828 in this lawsuit.

The parties have brought this dispute to the Court's attention and Judge Beckwith has set out the procedure by which she will consider each position and decide this issue. Counsel and the Court are making every effort to obtain a ruling on the dispute as soon as possible and hope to inform you of the result in the next few months.

Class Counsel,

Theresa L. Groh

John C. Murdock

Defendant's response to those letters, and I suggested we come to an agreement on the procedure by which the issue of vacation pay should be addressed. Mr. McElligott and I were unable to reach agreement, resulting in the phone conference with the Court on October 28, 2003.

5. I have also received multiple calls, which are increasing, from class members who have not received the promised response from International Paper within the 20 day period stated in the Notice.

6. I have not received copies of any responses from Defendant to any employees' letters, and have been informed by many employees that their letters to International Paper were sent well over 20 days ago and that they have received no response from International Paper.

7. Immediately after the October 28 phone conference with the Court, on October 29, 2003 I sent via electronic mail the letter to the class that I intended to submit to the Court for approval. A true and accurate copy of the letter which was sent to Mr. McElligott is attached to Plaintiffs' Motion for Court Approval of Class Communication as Exhibit A.

8. In that October 29 transmission I asked Mr. McElligott to inform me of any revisions so that the letter could be jointly submitted to the Court. When, one week later on November 5, 2003, I had heard nothing from Mr. McElligott, I sent another electronic message asking Mr. McElligott whether I could submit the letter and represent to the Court that Defendant did not oppose the language; I also informed Mr. McElligott that I intended to file the letter for the Court's review in the following days on November 6 or 7 before the end of that week. As of November 11, I have received no response from Defendant.

So declared this 11th day of November 2003, Cincinnati, Ohio.


Theresa L. Groh

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IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

<p>SCOTT D. DALESANDRO, et al., On behalf of themselves and all others similarly situated,</p> <p style="text-align: center;">Plaintiffs,</p> <p style="text-align: center;">v.</p> <p>THE INTERNATIONAL PAPER COMPANY,</p> <p style="text-align: center;">Defendant.</p>	<p>: Case No.: C-1-01-109</p> <p>:</p> <p>: Judge Sandra S. Beckwith</p> <p>:</p> <p>:</p> <p>: <u>ENTRY APPROVING CLASS</u></p> <p>: <u>COMMUNICATION</u></p> <p>:</p> <p>:</p> <p>:</p> <p>:</p>
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ENTRY

This matter is before the Court upon Plaintiffs' Motion for Court Approval of Class Communication. Attached to Plaintiffs' Motion is the proposed letter to members of the class from Class Counsel informing them of the status of the dispute between the parties as to Plaintiffs' entitlement to recover vacation pay in this lawsuit.

Upon consideration, Plaintiffs' Motion is GRANTED and the Court approves the form and content of the letter as submitted by Plaintiffs and authorizes its dissemination to the members of the class.

IT IS SO ORDERED.

Date: _____

Honorable Sandra S. Beckwith
United States District Judge